Alameda County Make Prisoners, et al. vs. ACSO, et al., Case No. 3:19-cv-07423-JSC

PLAINTIFFS' EXHIBIT C

Responses to Requests for Admissions from Deputy Joe With Proofs of Service Attached

1		
	Yolanda Huang (State Bar No. 104543)	
2	LAW OFFICES OF YOLANDA HUANG	
3	PO Box 5475 Berkeley, California 94705	
4	Telephone: (510) 329-2140	
	Facsimile: (510) 580-9410 E-Mail: yolanda@yhuanglaw.com	
5		
6	Thomas E. Nanney (State Bar No. 214342) Law Office of Thomas E. Nanney	
7	2217 W. 120th St.	
8	Leawood, Kansas 66209 Phone: (816) 401-0047	
8	Email: tomnanney@gmail.com	
9		
10	Attorneys for Plaintiffs	
11	LIMITED STATES	S DISTRICT COURT
' '		
12	NORTHERN DISTRICT OF CALIF	ORNIA, SAN FRANCISCO DIVISION
13	ALAMEDA COUNTY MALE PRISONERS	Case No. 3:19-cv-07423-JSC
14	And Former Prisoners, DANIEL GONZALEZ, et al. on behalf of themselves and others	PLAINTIFF DARYL GEYER'S RESPONSE
'-	similarly situated, as a Class, and Subclass;	TO INTERROGATORIES FROM
15	PLAINTIFFS,	DEFENDANT DEPUTY JOE, SET ONE
16		Indees District Indee Isognaline Scott
17	V.	Judge: District Judge Jacqueline Scott Corley
	ALAMEDA COUNTY SHERIFF'S	T.: 1 D.4 Mary (2024
18	OFFICE, ALAMEDA COUNTY, Deputy Joe, Deputy Ignont (sp) John and Jane ROEs,	Trial Date: May 6, 2024
19	Nos. 1 – 25,	
20	DEFENDANTS.	
20		
21	RESPONDING PARTY: Pla	uintiff DARRYL GEYER
22	PROPOUNDING DARTY.	for don't DEDITY IOE
23	PROPOUNDING PARTY: De	fendant DEPUTY JOE
	SET NO.:	VE (1)
24		
25		

Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE hereby serves the following Requests for Admission on Plaintiff DARRYL GEYER, to be answered, under oath, within thirty (30) days from the date of service.

RESPONSE TO REQUEST FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that YOU are not asserting any claims in this action against DEFENDANT.

RESPONSE TO REQUEST FOR ADMISSION NO.1:

Plaintiff DARRYL GEYER denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this particular deputy violated any of plaintiff's constitutional rights.

Dated: JULY 19, 2023 LAW OFFICE OF YOLANDA HUANG

By /s/ Yolanda Huang
Yolanda Huang
Attorney for Plaintiffs

1 PROOF OF SERVICE Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 2 STATE OF CALIFORNIA, COUNTY OF ALAMEDA 3 At the time of service, I was over 18 years of age and not a party to this action. I am 4 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 5 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** Daryl Geyer's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF DARYL 6 **GEYER, SET ONE** on the interested parties in this action as follows: 7 SEE ATTACHED SERVICE LIST BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the 8 document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 9 the transmission, any electronic message or other indication that the transmission was unsuccessful. 10 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this 11 Court at whose direction the service was made. Executed on July 19, 2023, at Berkeley, California. 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC Gregory B. Thomas (SBN 239870) 3 Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP 1999 Harrison Street, Suite 1650 Phone: (215) 963-5000 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com 8 amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com 9 Peter G. Bertling Peter James Van Zandt Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 12 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24

1		
	Yolanda Huang (State Bar No. 104543)	
2	LAW OFFICES OF YOLANDA HUANG	
3	PO Box 5475 Berkeley, California 94705	
4	Telephone: (510) 329-2140	
	Facsimile: (510) 580-9410	
5	E-Mail: <u>yolanda@yhuanglaw.com</u>	
6	Thomas E. Nanney (State Bar No. 214342)	
_	Law Office of Thomas E. Nanney 2217 W. 120th St.	
7	Leawood, Kansas 66209	
8	Phone: (816) 401-0047	
9	Email: tomnanney@gmail.com	
	Attorneys for Plaintiffs	
10		
11	UNITED STATE	S DISTRICT COURT
12	NORTHERN DISTRICT OF CALI	FORNIA, SAN FRANCISCO DIVISION
13	ALAMEDA COUNTY MALE	Case No. 3:19-cv-07423-JSC
	PRISONERS And Former Prisoners, DANIEL GONZALEZ, et al. on behalf of	PLAINTIFF DANIEL GONZALEZ'S
14	themselves and others similarly situated, as a	RESPONSE TO INTERROGATORIES
15	Class, and Subclass;	FROM DEFENDANT DEPUTY JOE, SET
16	PLAINTIFFS,	ONE
10	,	Judge: District Judge Jacqueline Scott
17	V.	Corley
18	ALAMEDA COUNTY SHERIFF'S	Trial Date: May 6, 2024
	OFFICE, ALAMEDA COUNTY, Deputy Joe, Deputy Ignont (sp) John and Jane ROEs,	
19	Nos. $1-25$,	
20	DEFENDANTS	
21	DEFENDANTS.	
ا ۲		
22	RESPONDING PARTY:	aintiff DANIEL GONZALEZ
23	PROPOUNDING PARTY: D	efendant DEPUTY JOE
24	SET NO.:	NE (1)
25		1 Case No. 3:19 ev 07/23

1	Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOI
2	hereby serves the following Requests for Admission on Plaintiff DANIEL GONZALEZ, to be
3	answered, under oath, within thirty (30) days from the date of service.
4	
5	RESPONSE TO REQUEST FOR ADMISSION
6	REQUEST FOR ADMISSION NO. 1:
7	Admit that YOU are not asserting any claims in this action against DEFENDANT.
8	RESPONSE TO REQUEST FOR ADMISSION NO.1:
9	DENY.
10	Dated: JULY 19, 2023 LAW OFFICE OF YOLANDA HUANG
11	Dated. JULY 19, 2025 LAW OFFICE OF TOLANDA HUANG
12	By /s/ Yolanda Huang
13	Yolanda Huang Attorney for Plaintiffs
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	

PROOF OF SERVICE 1 Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 2 STATE OF CALIFORNIA, COUNTY OF ALAMEDA 3 At the time of service, I was over 18 years of age and not a party to this action. I am 4 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 5 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** Daniel Gonzalez's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF 6 **DANIEL GONZALEZ, SET ONE** on the interested parties in this action as follows: 7 SEE ATTACHED SERVICE LIST BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the 8 document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 9 the transmission, any electronic message or other indication that the transmission was unsuccessful. 10 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made. 11 Executed on July 19, 2023, at Berkeley, California. 12 13 14 15 16 17 18 19 20 21 22 23 24

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC 3 Gregory B. Thomas (SBN 239870) Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP Phone: (215) 963-5000 1999 Harrison Street, Suite 1650 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com 8 amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com 9 Peter G. Bertling Peter James Van Zandt Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 12 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24

4

Case No. 3:19-cv-07423-JSC

1		
2	Yolanda Huang (State Bar No. 104543) LAW OFFICES OF YOLANDA HUANG	
	PO Box 5475	
3	Berkeley, California 94705	
4	Telephone: (510) 329-2140 Facsimile: (510) 580-9410	
5	E-Mail: yolanda@yhuanglaw.com	
6	Thomas E. Nanney (State Bar No. 214342) Law Office of Thomas E. Nanney	
7	2217 W. 120th St.	
	Leawood, Kansas 66209	
8	Phone: (816) 401-0047 Email: tomnanney@gmail.com	
9		
10	Attorneys for Plaintiffs	
11	UNITED STAT	ES DISTRICT COURT
12	NORTHERN DISTRICT OF CAL	FORNIA, SAN FRANCISCO DIVISION
13	ALAMEDA COUNTY MALE PRISONER	S Case No. 3:19-cv-07423-JSC
	And Former Prisoners, DANIEL GONZALEZ	
14	et al. on behalf of themselves and others similarly situated, as a Class, and Subclass,	PLAINTIFF RANDY HARRIS' RESPONSE TO INTERROGATORIES FROM
15	•	DEFENDANT DEPUTY JOE,
	PLAINTIFFS,	SET ONE
16	v.	Judge: District Judge Jacqueline Scott
17	ALAMEDA COUNTY SHERIFF'S	Corley
18	OFFICE, ALAMEDA COUNTY, Deputy	Trial Date: May 6, 2024
	Joe, Deputy Ignont (sp) John and Jane ROEs,	
19	Nos. $1 - 25$,	
20	DEFENDANTS.	
21		
22	RESPONDING PARTY:	Plaintiff RANDY HARRIS
23	PROPOUNDING PARTY:	Oxfordent DEDITY IOE
	FROTOUNDING PAKIT: L	Defendant DEPUTY JOE
24	SET NO.:	ONE (1)
25		O. N. 2.10 07422 I

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE 2 hereby serves the following Requests for Admission on Plaintiff ERIC WAYNE, to be answered, 3 under oath, within thirty (30) days from the date of service. 4 5 RESPONSE TO REQUEST FOR ADMISSION 6 **REQUEST FOR ADMISSION NO. 1:** 7 Admit that YOU are not asserting any claims in this action against DEFENDANT. 8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:** 9 Plaintiff RANDY HARRIS denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact with while 11 at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this 12 particular deputy violated any of plaintiff's constitutional rights. 13 14 Dated: JULY 19, 2023 LAW OFFICE OF YOLANDA HUANG 15 16 By /s/ Yolanda Huang 17 Yolanda Huang Attorney for Plaintiffs 18 19 20 21 22 23 24

1 PROOF OF SERVICE Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 2 STATE OF CALIFORNIA, COUNTY OF ALAMEDA 3 At the time of service, I was over 18 years of age and not a party to this action. I am 4 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 5 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** RANDY HARRIS' Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF 6 **ERIC WAYNE, SET ONE** on the interested parties in this action as follows: 7 SEE ATTACHED SERVICE LIST BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the 8 document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 9 the transmission, any electronic message or other indication that the transmission was unsuccessful. 10 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this 11 Court at whose direction the service was made. Executed on July 19, 2023, at Berkeley, California. 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC Gregory B. Thomas (SBN 239870) 3 Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP 1999 Harrison Street, Suite 1650 Phone: (215) 963-5000 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com 8 amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com 9 Peter James Van Zandt Peter G. Bertling Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24

1		
2	Yolanda Huang (State Bar No. 104543) LAW OFFICES OF YOLANDA HUANG	
3	PO Box 5475 Berkeley, California 94705	
4	Telephone: (510) 329-2140	
5	Facsimile: (510) 580-9410 E-Mail: <u>yolanda@yhuanglaw.com</u>	
6	Thomas E. Nanney (State Bar No. 214342)	
7	Law Office of Thomas E. Nanney 2217 W. 120th St.	
8	Leawood, Kansas 66209 Phone: (816) 401-0047	
9	Email: tomnanney@gmail.com	
10	Attorneys for Plaintiffs	
11	UNITED STATES	DISTRICT COURT
12	NORTHERN DISTRICT OF CALIFO	RNIA, SAN FRANCISCO DIVISION
13	ALAMEDA COUNTY MALE PRISONERS	Case No. 3:19-cv-07423-JSC
14	And Former Prisoners, DANIEL GONZALEZ, et al. on behalf of themselves and others	PLAINTIFF CEDRIC HENRY'S RESPONSE TO INTERROGATORIES FROM
15	similarly situated, as a Class, and Subclass;	DEFENDANT DEPUTY JOE,
16	PLAINTIFFS,	SET ONE
17	V.	Judge: District Judge Jacqueline Scott Corley
18	ALAMEDA COUNTY SHERIFF'S OFFICE, ALAMEDA COUNTY, Deputy	Trial Date: May 6, 2024
19	Joe, Deputy Ignont (sp) John and Jane ROEs, Nos. 1 – 25,	
20	DEFENDANTS.	
21		
22	RESPONDING PARTY: Plain	ntiff CEDRIC HENRY
23	PROPOUNDING PARTY: Defe	endant DEPUTY JOE
24	SET NO.:	E (1)
25		1

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE 2 hereby serves the following Requests for Admission on Plaintiff CEDRIC HENRY, to be 3 answered, under oath, within thirty (30) days from the date of service. 4 5 RESPONSE TO REQUEST FOR ADMISSION 6 **REQUEST FOR ADMISSION NO. 1:** 7 Admit that YOU are not asserting any claims in this action against DEFENDANT. 8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:** 9 Plaintiff CEDRIC HENRY denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact with while 11 at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this 12 particular deputy violated any of plaintiff's constitutional rights. 13 Dated: JULY 19, 2023 LAW OFFICE OF YOLANDA HUANG 14 15 By /s/ Yolanda Huang Yolanda Huang 16 Attorney for Plaintiffs 17 18 19 20 21 22 23 24 2 25

1 PROOF OF SERVICE 2 Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 3 STATE OF CALIFORNIA, COUNTY OF ALAMEDA At the time of service, I was over 18 years of age and not a party to this action. I am 5 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** 7 Cedric Henry's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF **CEDRIC HENRY, SET ONE** on the interested parties in this action as follows: 8 SEE ATTACHED SERVICE LIST 9 BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the 10 document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 11 the transmission, any electronic message or other indication that the transmission was 12 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this 13 Court at whose direction the service was made. 14 Executed on July 19, 2023, at Berkeley, California. 15 oshua Paiz 16 17 18 19 20 21 22 23 24 3 25

1	Gonzalez, et al. v. Alameda County Sheriff's Office, et al.	
3	Gregory B. Thomas (SBN 239870) E-mail: gthomas@bwslaw.com Temitayo O. Peters (SBN 309913)	Charles Reitmeyer Amanda F Lashner Emily S. Kimmelman
5	E-mail: tpeters@bwslaw.com Jasper L. Hall (SBN 341113) E-mail: jhall@bwslaw.com	MORGAN LEWIS AND BOCKIUS LLP 1701 Market Street Philadelphia, PA 19103
6	BURKE, WILLIAMS & SORENSEN, LLP 1999 Harrison Street, Suite 1650	Phone: (215) 963-5000 Fax: (215) 963-5001
7	Oakland, California 94612-3520 Tel: 510.273.8780 Fax: 510.839.9104	Email: charles.reitmeyer@morganlewis.com amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com
9		emmy management wis com
10	Peter G. Bertling Jemma S. Parker Saunders	Peter James Van Zandt Salayha Khaliq Ghoury
11	BERTLING LAW GROUP, INC. 21 East Canon Perdido Street, Suite 204B	LEWIS BRISBOIS BISGAARD & SMITH 45 Fremont Street, Ste 3000
12	Santa Barbara, CA 93101-8215 Phone: (805) 879-7558 Fax: (805) 869-1597	San Francisco, CA 94105 Phone: (415) 362-2580
13 14	Email: peter@bertlinglawgroup.com jemma@bertlinglawgroup.com	Fax: (415) 434-0882 Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com
15		, , ,
16		
17		
18		
19		
20		
21		
23		
24		
25		4

1		
	Yolanda Huang (State Bar No. 104543)	
2	LAW OFFICES OF YOLANDA HUANG	
3	PO Box 5475 Berkeley, California 94705	
4	Telephone: (510) 329-2140	
4	Facsimile: (510) 580-9410	
5	E-Mail: <u>yolanda@yhuanglaw.com</u>	
6	Thomas E. Nanney (State Bar No. 214342)	
_	Law Office of Thomas E. Nanney 2217 W. 120th St.	
7	Leawood, Kansas 66209	
8	Phone: (816) 401-0047	
	Email: tomnanney@gmail.com	
9	Attomorya for Plaintiffs	
10	Attorneys for Plaintiffs	
	AN AMERICAN	DIGEDIGE GOVER
11	UNITED STATES	DISTRICT COURT
12	NORTHERN DISTRICT OF CALIFO	RNIA, SAN FRANCISCO DIVISION
13	ALAMEDA COUNTY MALE PRISONERS And Former Prisoners, DANIEL GONZALEZ,	Case No. 3:19-cv-07423-JSC
14	et al. on behalf of themselves and others	PLAINTIFF MICHAEL LOCKHART'S
	similarly situated, as a Class, and Subclass;	RESPONSE TO INTERROGATORIES
15	PLAINTIFFS,	FROM DEFENDANT DEPUTY JOE, SET ONE
16	TEARTIFFS,	SET ONE
10	V.	Judge: District Judge Jacqueline Scott
17	ALAMEDA COUNTY SHERIFF'S	Corley
18	OFFICE, ALAMEDA COUNTY, Deputy Joe, Deputy Ignont (sp) John and Jane ROEs,	Trial Date: May 6, 2024
10	Nos. $1-25$,	
19		
20	DEFENDANTS.	
24		
21	DECORATE DATE	CONTROLLER LOCKINA DE
22	RESPONDING PARTY: Plair	ntiff MICHAEL LOCKHART
23	PROPOUNDING PARTY: Defe	endant DEPUTY JOE
	SET NO.: ONI	E (1)
24		
25		1 Case No. 3:19-cv-07423-JSC

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE 2 hereby serves the following Requests for Admission on Plaintiff MICHAEL LOCKHART, to be 3 answered, under oath, within thirty (30) days from the date of service. 4 5 **RESPONSE TO REQUEST FOR ADMISSION** 6 **REQUEST FOR ADMISSION NO. 1:** 7 Admit that YOU are not asserting any claims in this action against DEFENDANT. 8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:** 9 Plaintiff MICHAEL LOCKHART denies this request for admission on the grounds that 10 plaintiff was not informed of and does not know the name of all deputies he came into contact 11 with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state 12 whether this particular deputy violated any of plaintiff's constitutional rights. 13 Dated: JULY 19, 2023 LAW OFFICE OF YOLANDA HUANG 14 15 By /s/ Yolanda Huang Yolanda Huang 16 Attorney for Plaintiffs 17 18 19 20 21 22 23 24

1 PROOF OF SERVICE Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 2 STATE OF CALIFORNIA, COUNTY OF ALAMEDA 3 At the time of service, I was over 18 years of age and not a party to this action. I am 4 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 5 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** Michael Lockhart's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF 6 MICHAEL LOCKHART, SET ONE on the interested parties in this action as follows: 7 SEE ATTACHED SERVICE LIST 8 BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 9 the transmission, any electronic message or other indication that the transmission was unsuccessful. 10 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this 11 Court at whose direction the service was made. Executed on July 19, 2023, at Berkeley, California. 12 13 14 15 16 17 18 19 20 21 22 23

24

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC 3 Gregory B. Thomas (SBN 239870) Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP Phone: (215) 963-5000 1999 Harrison Street, Suite 1650 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com 8 amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com 9 Peter G. Bertling Peter James Van Zandt Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 12 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24

Case No. 3:19-cv-07423-JSC

1	Yolanda Huang (State Bar No. 104543)		
2	LAW OFFICES OF YOLANDA HUANG		
3	PO Box 5475 Berkeley, California 94705		
4	Telephone: (510) 329-2140		
	Facsimile: (510) 580-9410 E-Mail: yolanda@yhuanglaw.com		
5			
6	Thomas E. Nanney (State Bar No. 214342) Law Office of Thomas E. Nanney		
7	2217 W. 120th St.		
8	Leawood, Kansas 66209 Phone: (816) 401-0047		
	Email: tomnanney@gmail.com		
9	Attorneys for Plaintiffs		
10			
11	UNITED STAT	ΓES I	DISTRICT COURT
12	NORTHERN DISTRICT OF CAL	LIFO	RNIA, SAN FRANCISCO DIVISION
13	ALAMEDA COUNTY MALE PRISONEI		Case No. 3:19-cv-07423-JSC
14	And Former Prisoners, DANIEL GONZALE et al. on behalf of themselves and others	sz,	PLAINTIFF JAMES MALLETT'S
	similarly situated, as a Class, and Subclass;		RESPONSE TO INTERROGATORIES FROM DEFENDANT DEPUTY JOE,
15	PLAINTIFFS,		SET ONE
16	v.		Judge: District Judge Jacqueline Scott
17	ALAMEDA COUNTY SHERIFF'S		Corley
18	OFFICE, ALAMEDA COUNTY, Deputy		Trial Date: May 6, 2024
	Joe, Deputy Ignont (sp) John and Jane ROEs Nos. 1 – 25,	,	
19			
20	DEFENDANTS.		
21		<u>.</u>	
22	RESPONDING PARTY:	Plain	tiff JAMES MALLETT
23			
	PROPOUNDING PARTY:	Defe	ndant DEPUTY JOE
24	SET NO.:	ONE	(1)
25			

1

Case No. 3:19-cv-07423-JSC PLTF JAMES MALLETT'S RESPONSE TO REQ FOR ADMISSION FROM DEFT DEPUTY JOE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE 2 hereby serves the following Requests for Admission on Plaintiff JAMES MALLETT, to be 3 answered, under oath, within thirty (30) days from the date of service. 4 5 **RESPONSE TO REQUEST FOR ADMISSION** 6 **REQUEST FOR ADMISSION NO. 1:** 7 Admit that YOU are not asserting any claims in this action against DEFENDANT. 8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:** 9 Plaintiff JAMES MALLETT denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact with while 11 at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this 12 particular deputy violated any of plaintiff's constitutional rights. 13 Dated: JULY 19, 2023 LAW OFFICE OF YOLANDA HUANG 14 15 By /s/ Yolanda Huang Yolanda Huang 16 Attorney for Plaintiffs 17 18 19 20 21 22 23 24

1 PROOF OF SERVICE Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 2 STATE OF CALIFORNIA, COUNTY OF ALAMEDA 3 At the time of service, I was over 18 years of age and not a party to this action. I am 4 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 5 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** James Mallett's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF **JAMES MALLETT, SET ONE** on the interested parties in this action as follows: 7 SEE ATTACHED SERVICE LIST BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the 8 document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 9 the transmission, any electronic message or other indication that the transmission was unsuccessful. 10 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this 11 Court at whose direction the service was made. Executed on July 19, 2023, at Berkeley, California. 12 13 14 15 16 17 18 19 20 21 22 23 24

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC Gregory B. Thomas (SBN 239870) 3 Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP 1999 Harrison Street, Suite 1650 Phone: (215) 963-5000 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com 8 amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com 9 Peter G. Bertling Peter James Van Zandt Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 12 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24 25

1		
2	Yolanda Huang (State Bar No. 104543) LAW OFFICES OF YOLANDA HUANG	
3	PO Box 5475 Berkeley, California 94705	
4	Telephone: (510) 329-2140	
5	Facsimile: (510) 580-9410 E-Mail: <u>yolanda@yhuanglaw.com</u>	
6	Thomas E. Nanney (State Bar No. 214342)	
7	Law Office of Thomas E. Nanney 2217 W. 120th St.	
	Leawood, Kansas 66209	
8	Phone: (816) 401-0047 Email: tomnanney@gmail.com	
9		
10	Attorneys for Plaintiffs	
11	UNITED STATES	DISTRICT COURT
12	NORTHERN DISTRICT OF CALIFO	PRNIA, SAN FRANCISCO DIVISION
13	ALAMEDA COUNTY MALE PRISONERS And Former Prisoners, DANIEL GONZALEZ,	Case No. 3:19-cv-07423-JSC
14	et al. on behalf of themselves and others	PLAINTIFF DAVID MISCH'S RESPONSE
15	similarly situated, as a Class, and Subclass;	TO INTERROGATORIES FROM DEFENDANT DEPUTY JOE,
	PLAINTIFFS,	SET ONE
16	V.	Judge: District Judge Jacqueline Scott Corley
17	ALAMEDA COUNTY SHERIFF'S	Coney
18	OFFICE, ALAMEDA COUNTY , Deputy Joe, Deputy Ignont (sp) John and Jane ROEs,	Trial Date: May 6, 2024
19	Nos. 1 – 25,	
20	DEFENDANTS.	
21		
22	RESPONDING PARTY: Plai	ntiff DAVID MISCH
23		
		endant DEPUTY JOE
24	SET NO.:	$\Xi(1)$
25		1 Case No. 3:19-cv-07423-J

Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE
hereby serves the following Requests for Admission on Plaintiff DAVID MISCH, to be answered,
under oath, within thirty (30) days from the date of service.
RESPONSE TO REQUEST FOR ADMISSION
REQUEST FOR ADMISSION NO. 1:
Admit that YOU are not asserting any claims in this action against DEFENDANT.
RESPONSE TO REQUEST FOR ADMISSION NO.1:
Plaintiff DAVID MISCH denies this request for admission on the grounds that plaintiff
was not informed of and does not know the name of all deputies he came into contact with while
at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this
particular deputy violated any of plaintiff's constitutional rights.
REQUEST FOR ADMISSION NO. 2:
Admit that YOU did not assert any claims for "adequate sanitation" against COUNTY in
YOUR Fifth Amended Complaint.
RESPONSE TO REQUEST FOR ADMISSION NO.2:
ADMIT. Plaintiff David Misch is asserting claims for "inadequate sanitation" against
COUNTY in YOUR Fifth Amended Complaint.
REQUEST FOR ADMISSION NO. 3:
Admit that YOU did not assert any claims for "adequate sanitation" against ACSO in the
Fifth Amended Complaint.
RESPONSE TO REQUEST FOR ADMISSION NO.3:
ADMIT. Plaintiff David Misch is asserting claims for "inadequate sanitation" against
ACSO in the Fifth Amended Complaint.

Case 3:19-cv-07423-JSC Document 343-3 Filed 10/18/23 Page 28 of 50

1	Dated: JULY 19, 2023	LAW OFFICE OF YOLANDA HUANG
2		
3		By /s/ Yolanda Huang
4		By /s/ Yolanda Huang Yolanda Huang Attorney for Plaintiffs
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1 PROOF OF SERVICE Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 2 STATE OF CALIFORNIA, COUNTY OF ALAMEDA 3 At the time of service, I was over 18 years of age and not a party to this action. I am 4 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 5 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** David Misch's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF DAVID 6 **MISCH, SET ONE** on the interested parties in this action as follows: 7 SEE ATTACHED SERVICE LIST BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the 8 document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 9 the transmission, any electronic message or other indication that the transmission was unsuccessful. 10 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this 11 Court at whose direction the service was made. Executed on July 19, 2023, at Berkeley, California. 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC Gregory B. Thomas (SBN 239870) 3 Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP 1999 Harrison Street, Suite 1650 Phone: (215) 963-5000 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com 8 amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com 9 Peter G. Bertling Peter James Van Zandt Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 12 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24

1		
2	Yolanda Huang (State Bar No. 104543) LAW OFFICES OF YOLANDA HUANG	
	PO Box 5475	
3	Berkeley, California 94705 Telephone: (510) 329-2140	
4	Facsimile: (510) 580-9410	
5	E-Mail: <u>yolanda@yhuanglaw.com</u>	
6	Thomas E. Nanney (State Bar No. 214342)	
7	Law Office of Thomas E. Nanney 2217 W. 120th St.	
	Leawood, Kansas 66209	
8	Phone: (816) 401-0047 Email: tomnanney@gmail.com	
9		
10	Attorneys for Plaintiffs	
11	UNITED STATES	DISTRICT COURT
12		DRNIA, SAN FRANCISCO DIVISION
13	ALAMEDA COUNTY MALE PRISONERS And Former Prisoners, DANIEL GONZALEZ,	Case No. 3:19-cv-07423-JSC
14	et al. on behalf of themselves and others	PLAINTIFF TIMOTHY PHILLIPS'
15	similarly situated, as a Class, and Subclass;	RESPONSE TO INTERROGATORIES FROM DEFENDANT DEPUTY JOE,
	PLAINTIFFS,	SET ONE
16	V.	Judge: District Judge Jacqueline Scott
17	ALAMEDA COUNTY SHERIFF'S	Corley
18	OFFICE, ALAMEDA COUNTY, Deputy Joe, Deputy Ignont (sp) John and Jane ROEs, Nos. 1	Trial Date: May 6, 2024
19	-25,	
20	DEFENDANTS.	
21	RESPONDING PARTY: Plai	ntiff TIMOTHY PHILLIPS
22		
23	PROPOUNDING PARTY: Def	endant DEPUTY JOE
24	SET NO.:	E (1)
25		
- 1	1	1 C N 2 10 074

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE 2 hereby serves the following Requests for Admission on Plaintiff TIMOTHY PHILLIPS, to be 3 answered, under oath, within thirty (30) days from the date of service. 4 5 **RESPONSE TO REQUEST FOR ADMISSION** 6 **REQUEST FOR ADMISSION NO. 1:** 7 Admit that YOU are not asserting any claims in this action against DEFENDANT. 8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:** 9 Plaintiff TIMOTHY PHILLIPS denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact 10 11 with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state 12 whether this particular deputy violated any of Plaintiff's constitutional rights. 13 Dated: JULY 19, 2023 LAW OFFICE OF YOLANDA HUANG 14 15 By /s/ Yolanda Huang Yolanda Huang 16 Attorney for Plaintiffs 17 18 19 20 21 22 23 24

1 PROOF OF SERVICE Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 2 STATE OF CALIFORNIA, COUNTY OF ALAMEDA 3 At the time of service, I was over 18 years of age and not a party to this action. I am 4 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 5 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** Timothy Phillips' Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF 6 **TIMOTHY PHILLIPS, SET ONE** on the interested parties in this action as follows: 7 SEE ATTACHED SERVICE LIST BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the 8 document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 9 the transmission, any electronic message or other indication that the transmission was unsuccessful. 10 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this 11 Court at whose direction the service was made. Executed on July 19, 2023, at Berkeley, California. 12 13 14 15 16 17 18 19 20 21 22 23 24

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC Gregory B. Thomas (SBN 239870) 3 Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP 1999 Harrison Street, Suite 1650 Phone: (215) 963-5000 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com 8 amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com 9 Peter G. Bertling Peter James Van Zandt Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 12 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24

1	Yolanda Huang (State Bar No. 104543)	
2	LAW OFFICES OF YOLANDA HUANG	
3	PO Box 5475	
٦	Berkeley, California 94705	
4	Telephone: (510) 329-2140 Facsimile: (510) 580-9410	
5	E-Mail: yolanda@yhuanglaw.com	
	Thomas E. Nanney (State Bar No. 214342)	
6	Law Office of Thomas E. Nanney	
7	2217 W. 120th St. Leawood, Kansas 66209	
8	Phone: (816) 401-0047	
	Email: tomnanney@gmail.com	
9	Attomovya for Dlaintiffa	
10	Attorneys for Plaintiffs	
11	UNITED STATES	S DISTRICT COURT
12	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION	
13	ALAMEDA COUNTY MALE PRISONERS	Case No. 3:19-cv-07423-JSC
,,	And Former Prisoners, DANIEL GONZALEZ, et al. on behalf of themselves and others	PLAINTIFF ERIC RIVERA'S RESPONSE
14	similarly situated, as a Class, and Subclass;	TO INTERROGATORIES FROM
15	PLAINTIFFS,	DEFENDANT DEPUTY JOE, SET ONE
16	TLANTIFFS,	SET ONE
	v.	Judge: District Judge Jacqueline Scott
17	ALAMEDA COUNTY SHERIFF'S	Corley
18	OFFICE, ALAMEDA COUNTY, Deputy	Trial Date: May 6, 2024
19	Joe, Deputy Ignont (sp) John and Jane ROEs, Nos. $1-25$,	
19	,	
20	DEFENDANTS.	
21		
20		
22	RESPONDING PARTY: Pla	nintiff ERIC RIVERA
23	PROPOUNDING PARTY: De	fendant DEPUTY JOE
24	SET NO.: ONE (1)	
25		
20		1 Case No. 3:19-cv-07423-J

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE 2 hereby serves the following Requests for Admission on Plaintiff ERIC RIVERA, to be answered, 3 under oath, within thirty (30) days from the date of service. 4 5 **RESPONSE TO REQUEST FOR ADMISSION** 6 **REQUEST FOR ADMISSION NO. 1:** 7 Admit that YOU are not asserting any claims in this action against DEFENDANT. 8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:** 9 Plaintiff ERIC RIVERA denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact with while at 11 Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this 12 particular deputy violated any of plaintiff's constitutional rights. 13 Dated: JULY 19, 2023 LAW OFFICE OF YOLANDA HUANG 14 15 By /s/ Yolanda Huang Yolanda Huang 16 Attorney for Plaintiffs 17 18 19 20 21 22 23 24 25

1 PROOF OF SERVICE Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 2 STATE OF CALIFORNIA, COUNTY OF ALAMEDA 3 At the time of service, I was over 18 years of age and not a party to this action. I am 4 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 5 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** Eric Rivera's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF ERIC 6 **RIVERA, SET ONE** on the interested parties in this action as follows: 7 SEE ATTACHED SERVICE LIST BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the 8 document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 9 the transmission, any electronic message or other indication that the transmission was unsuccessful. 10 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this 11 Court at whose direction the service was made. Executed on July 19, 2023, at Berkeley, California. 12 13 14 15 16 17 18 19 20 21 22 23 24

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC Gregory B. Thomas (SBN 239870) 3 Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP 1999 Harrison Street, Suite 1650 Phone: (215) 963-5000 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com 8 amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com 9 Peter G. Bertling Peter James Van Zandt Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 12 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24

- 1		
1		
2	Yolanda Huang (State Bar No. 104543)	
	LAW OFFICES OF YOLANDA HUANG PO Box 5475	
3	Berkeley, California 94705	
4	Telephone: (510) 329-2140 Facsimile: (510) 580-9410	
5	E-Mail: <u>yolanda@yhuanglaw.com</u>	
6	Thomas E. Nanney (State Bar No. 214342) Law Office of Thomas E. Nanney	
7	2217 W. 120th St.	
	Leawood, Kansas 66209 Phone: (816) 401-0047	
8	Email: tomnanney@gmail.com	
9	Au C Di : «'CC	
10	Attorneys for Plaintiffs	
11	UNITED STATES DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION	
13	ALAMEDA COUNTY MALE PRISONERS And Former Prisoners, DANIEL GONZALEZ	
14	et al. on behalf of themselves and others	PLAINTIFF RASHEED TUCKER'S
15	similarly situated, as a Class, and Subclass;	RESPONSE TO INTERROGATORIES FROM DEFENDANT DEPUTY JOE,
	PLAINTIFFS,	SET ONE
16	v.	Judge: District Judge Jacqueline Scott
17	ALAMEDA COUNTY SHERIFF'S	Corley
18	OFFICE, ALAMEDA COUNTY, Deputy Joe, Deputy Ignont (sp) John and Jane ROEs,	Trial Date: May 6, 2024
19	Nos. 1 – 25,	
20	DEFENDANTS.	
21		
22	RESPONDING PARTY: P	aintiff RASHEED TUCKER
23	PROPOUNDING PARTY: D	efendant DEPUTY JOE
24		
	SET NO.:	NE (1)
25		1 Case No. 3:19-cy-07423

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE 2 hereby serves the following Requests for Admission on Plaintiff RASHEED TUCKER, to be 3 answered, under oath, within thirty (30) days from the date of service. 4 5 **RESPONSE TO REQUEST FOR ADMISSION** 6 **REQUEST FOR ADMISSION NO. 1:** 7 Admit that YOU are not asserting any claims in this action against DEFENDANT. 8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:** 9 Plaintiff RASHEED TUCKER denies this request for admission on the grounds that 10 plaintiff was not informed of and does not know the name of all deputies he came into contact 11 with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state 12 whether this particular deputy violated any of plaintiff's constitutional rights. 13 Dated: JULY 19, 2023 LAW OFFICE OF YOLANDA HUANG 14 15 By /s/ Yolanda Huang Yolanda Huang 16 Attorney for Plaintiffs 17 18 19 20 21 22 23 24

2

1 2 3 4 Street, Suite A, Berkeley, CA 94703 5 6 7 8 9 unsuccessful. 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24

25

PROOF OF SERVICE Gonzalez, et al. v. Alameda County Sheriff's Office, et al.

Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** Rasheed Tucker's Responses to DEFENDANT DEPUTY JOE'S RFÀ TO PLAINTIFF **RASHEED TUCKER, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC Gregory B. Thomas (SBN 239870) 3 Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP 1999 Harrison Street, Suite 1650 Phone: (215) 963-5000 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com amanda.lashner@morganlewis.com 8 emily.kimmelman@morganlewis.com 9 Peter G. Bertling Peter James Van Zandt Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 12 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24

1			
	Yolanda Huang (State Bar No. 104543)		
2	LAW OFFICES OF YOLANDA HUANG		
3	PO Box 5475 Berkeley, California 94705		
4	Telephone: (510) 329-2140		
7	Facsimile: (510) 580-9410		
5	E-Mail: <u>yolanda@yhuanglaw.com</u>		
6	Thomas E. Nanney (State Bar No. 214342)		
_	Law Office of Thomas E. Nanney 2217 W. 120th St.		
7	Leawood, Kansas 66209		
8	Phone: (816) 401-0047		
9	Email: tomnanney@gmail.com		
9	Attorneys for Plaintiffs		
10	, and the second		
11	UNITED STAT	ES DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION		
12			
13	ALAMEDA COUNTY MALE PRISONERS And Former Prisoners,	Case No. 3:19-cv-07423-JSC	
14	DANIEL GONZALEZ, et al. on behalf of	PLAINTIFF TIKISHA UPSHAW'S	
	themselves and others similarly situated, as a	RESPONSE TO INTERROGATORIES	
15	Class, and Subclass;	FROM DEFENDANT DEPUTY JOE, SET ONE	
16	PLAINTIFFS,		
, ,	v	Judge: District Judge Jacqueline Scott Corley	
17			
18	ALAMEDA COUNTY SHERIFF'S OFFICE, ALAMEDA COUNTY, Deputy	Trial Date: May 6, 2024	
19	Joe, Deputy Ignont (sp) John and Jane ROEs,		
19	Nos. 1 – 25,		
20	DEFENDANTS.		
21			
22	RESPONDING PARTY:	Plaintiff TIKISHA UPSHAW	
23	PROPOUNDING PARTY:	Defendant DEPUTY JOE	
24	SET NO.:	ONE (1)	
	SEI NO.:	ONE (1)	
25		1 Case No. 3:19-ev-074	

Case No. 3:19-cv-07423-JSC PLTF TIKISHA UPSHAW'S RESPONSE TO REQ FOR ADMISSION FROM DEFT DEPUTY JOE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE 2 hereby serves the following Requests for Admission on Plaintiff TIKISHA UPSHAW, to be 3 answered, under oath, within thirty (30) days from the date of service. 4 5 **RESPONSE TO REQUEST FOR ADMISSION** 6 **REQUEST FOR ADMISSION NO. 1:** 7 Admit that YOU are not asserting any claims in this action against DEFENDANT. 8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:** 9 Plaintiff TIKISHA UPSHAW denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies she came into contact 10 11 with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state 12 whether this particular deputy violated any of plaintiff's constitutional rights. 13 Dated: JULY 19, 2023 LAW OFFICE OF YOLANDA HUANG 14 15 By /s/ Yolanda Huang Yolanda Huang 16 Attorney for Plaintiffs 17 18 19 20 21 22 23 24

1 PROOF OF SERVICE Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 2 STATE OF CALIFORNIA, COUNTY OF ALAMEDA 3 At the time of service, I was over 18 years of age and not a party to this action. I am 4 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 5 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** Tikisha Upshaw's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF 6 TIKISHA UPSHAW, SET ONE on the interested parties in this action as follows: 7 SEE ATTACHED SERVICE LIST BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the 8 document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 9 the transmission, any electronic message or other indication that the transmission was unsuccessful. 10 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this 11 Court at whose direction the service was made. Executed on July 19, 2023, at Berkeley, California. 12 13 14 15 16 17 18 19 20 21 22 23 24

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC Gregory B. Thomas (SBN 239870) 3 Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP 1999 Harrison Street, Suite 1650 Phone: (215) 963-5000 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com 8 amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com 9 Peter G. Bertling Peter James Van Zandt Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 12 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24

ادا			
1	Yolanda Huang (State Bar No. 104543)		
2	LAW OFFICES OF YOLANDA HUANG		
	PO Box 5475		
3	Berkeley, California 94705		
4	Telephone: (510) 329-2140		
	Facsimile: (510) 580-9410 E-Mail: yolanda@yhuanglaw.com		
5	E-Maii. <u>yolanda(@ynuangiaw.com</u>		
6	Thomas E. Nanney (State Bar No. 214342)		
	Law Office of Thomas E. Nanney 2217 W. 120th St.		
7	Leawood, Kansas 66209		
8	Phone: (816) 401-0047		
	Email: tomnanney@gmail.com		
9	C DI : : : CC		
10	Attorneys for Plaintiffs		
11	UNITED STATES DISTRICT COURT		
12	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION		
13	ALAMEDA COUNTY MALE PRISONERS		
	And Former Prisoners, DANIEL GONZALEZ,		
14	et al. on behalf of themselves and others similarly situated, as a Class, and Subclass,	PLAINTIFF ERIC WAYNE'S RESPONSE TO INTERROGATORIES FROM	
15		DEFENDANT DEPUTY JOE,	
	PLAINTIFFS,	SET ONE	
16	v.	Judge: District Judge Jacqueline Scott	
17		Corley	
	ALAMEDA COUNTY SHERIFF'S	T:15	
18	OFFICE, ALAMEDA COUNTY , Deputy Joe, Deputy Ignont (sp) John and Jane ROEs,	Trial Date: May 6, 2024	
19	Nos. $1-25$,		
'	DEFENDA NEG		
20	DEFENDANTS.		
21			
22	RESPONDING PARTY: Pl	aintiff ERIC WAYNE	
23	PROPOUNDING PARTY: De	efendant DEPUTY JOE	
24	SET NO.: ONE (1)		
25			
		1 Case No. 3:19-cv-07423-J	

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE 2 hereby serves the following Requests for Admission on Plaintiff ERIC WAYNE, to be answered, 3 under oath, within thirty (30) days from the date of service. 4 5 **RESPONSE TO REQUEST FOR ADMISSION** 6 **REQUEST FOR ADMISSION NO. 1:** 7 Admit that YOU are not asserting any claims in this action against DEFENDANT. 8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:** 9 Plaintiff ERIC WAYNE denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact with while at 11 Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this 12 particular deputy violated any of plaintiff's constitutional rights. 13 14 LAW OFFICE OF YOLANDA HUANG Dated: JULY 19, 2023 15 16 By /s/ Yolanda Huang 17 Yolanda Huang Attorney for Plaintiffs 18 19 20 21 22 23 24

1 PROOF OF SERVICE Gonzalez, et al. v. Alameda County Sheriff's Office, et al. Case No. 3:19-cv-07423-JSC 2 STATE OF CALIFORNIA, COUNTY OF ALAMEDA 3 At the time of service, I was over 18 years of age and not a party to this action. I am 4 employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703 5 On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff** Eric Wayne's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF ERIC 6 WAYNE, SET ONE on the interested parties in this action as follows: 7 SEE ATTACHED SERVICE LIST BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the 8 document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the email addresses listed in the Service List. I did not receive, within a reasonable time after 9 the transmission, any electronic message or other indication that the transmission was unsuccessful. 10 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this 11 Court at whose direction the service was made. Executed on July 19, 2023, at Berkeley, California. 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 **SERVICE LIST** Gonzalez, et al. v. Alameda County Sheriff's Office, et al. 2 Case No. 3:19-cv-07423-JSC Gregory B. Thomas (SBN 239870) 3 Charles Reitmeyer E-mail: gthomas@bwslaw.com Amanda F Lashner Temitayo O. Peters (SBN 309913) Emily S. Kimmelman E-mail: tpeters@bwslaw.com MORGAN LEWIS AND BOCKIUS LLP Jasper L. Hall (SBN 341113) 1701 Market Street E-mail: jhall@bwslaw.com Philadelphia, PA 19103 BURKE, WILLIAMS & SORENSEN, LLP 1999 Harrison Street, Suite 1650 Phone: (215) 963-5000 Oakland, California 94612-3520 Fax: (215) 963-5001 Tel: 510.273.8780 Fax: 510.839.9104 Email: charles.reitmeyer@morganlewis.com 8 amanda.lashner@morganlewis.com emily.kimmelman@morganlewis.com 9 Peter G. Bertling Peter James Van Zandt Jemma S. Parker Saunders Salayha Khaliq Ghoury BERTLING LAW GROUP, INC. LEWIS BRISBOIS BISGAARD & SMITH 11 21 East Canon Perdido Street, Suite 204B 45 Fremont Street, Ste 3000 Santa Barbara, CA 93101-8215 San Francisco, CA 94105 12 Phone: (805) 879-7558 Fax: (805) 869-1597 Phone: (415) 362-2580 Email: peter@bertlinglawgroup.com Fax: (415) 434-0882 13 jemma@bertlinglawgroup.com Email: peter.vanzandt@lewisbrisbois.com salayha.ghoury@lewisbrisbois.com 14 15 16 17 18 19 20 21 22 23 24